

JUDGE BUCHWALD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
UNITED STATES OF AMERICA :
- v. - :
RAYQUAN TURNER, :
Defendant. :
- - - - - X

INDICTMENT

20 Cr.

20 CRIM 302

COUNT ONE

The Grand Jury charges:

1. On or about July 5, 2019, in the Southern District of New York, RAYQUAN TURNER, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess a firearm, to wit, a Cobra Enterprises .380 caliber pistol, and the firearm was in and affecting commerce.

(Title 18, United States Code, Section 922(g)(1).)

COUNT TWO

The Grand Jury further charges:

2. On or about July 5, 2019, in the Southern District of New York, RAYQUAN TURNER, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance involved in the offense was

mixtures and substances containing detectable amounts of heroin and fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C).


(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C).)


COUNT THREE

The Grand Jury further charges:

4. On or about July 5, 2019, in the Southern District of New York, RAYQUAN TURNER, the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the drug trafficking crime charged in Count Two of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crime, did possess a firearm, and did aid and abet the same.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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v.

RAYQUAN TURNER,


Defendant.

INDICTMENT

20 Cr.

(18 U.S.C. §§ 922(g), 924(c)(1)(A)(i);
21 U.S.C. §§ 812, 841(a)(1),
841(b)(1)(C).)

GEOFFREY S. BERMAN
United States Attorney



Foreperson
